



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

December 29, 2008

Ref: 98-024-AFS

Suzanne Rainville  
Forest Supervisor  
800 West Lakeside Avenue  
McCall, ID 83638-3602

Dear Ms. Rainville:

The U.S. Environmental Protection Agency (EPA) has reviewed the supplemental draft Environmental Impact Statement (SEIS) for the **Southwest Idaho Ecogroup Land and Resource Management Plans** in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The SEIS evaluates 5 additional alternatives (7E, 7G, 7H, 7J, and 7K) to the selected alternative (Alternative 7) in the 2003 final EIS in order to address big horn sheep viability in the Payette National Forest (NF). The Regional Forester received appeals to the ROD based on the allowance of domestic grazing within the range of the bighorn sheep, threatening their viability. The Appeal Reviewing Officer found that the Forest Plan did not protect or maintain bighorn sheep habitat in the Hells Canyon area and the Regional Forester's 2003 decision was reversed. In particular it was deemed that the bighorn sheep were not protected from current and future threat of disease transmission from domestic sheep, a major threat to the survival bighorn sheep. The 5 alternatives in the SEIS are evaluated based on big horn sheep habitat, rangeland resources/socio-economic impacts, and Tribal rights and interests. These alternatives comply with the Hells Canyon National Recreation Area Act by not allowing grazing within the Hells Canyon National Recreation Area, an improvement over alternatives analyzed in the 2003 final EIS.

The SEIS discusses extensive scientific literature supporting the linkage between bighorn sheep die off and contact with domestic sheep. Because bighorn sheep can be highly susceptible to diseases carried by domestic sheep, namely bacterial pneumonia caused by a large and diverse group of bacteria (*Pasteurella* spp.), it is critical to understand current, historic and potential future bighorn sheep habitat to reduce risk of contact with domestic sheep. In order to develop an overall risk model and compare alternatives, three (3) components were modeled and overlaid on a map. These are (1) two geographic population ranges (GPR) for bighorn sheep - Hells Canyon and Salmon River, (2) locations where bighorn sheep might contact domestic sheep, and (3) where "source habitat" exists, which is habitat that contains macrovegetation that contributes

to positive population growth for a species in a specified area and time. From this, a risk factor for potential contact was generated for areas that remain open to domestic grazing for each alternative. The range of alternatives developed from the analysis span from Alternative 7E, which designates all of the Payette NF as unsuitable for domestic sheep grazing, 2,300,353 acres, and has the least risk of bighorn sheep contact with domestic sheep (0%) to Alternative 7K, which designates 122,231 as unsuitable for domestic sheep allotments with a remaining 72% risk of contact. The Agency Preferred Alternative (Alternative 7G), balances protection of bighorn sheep, Tribal access, and socio-economics of domestic grazing. Alternative 7G determines that 1,172,564 acres are unsuitable for grazing and that there remains a 20% risk of contact.

We recognize the challenge of balancing NF management to protect natural resources while supporting other forest uses. We believe that the Preferred Alternative encourages bighorn sheep viability and balances tribal interests and rangeland resources. However, under this alternative, there remains risk of contact (20%) between bighorn sheep with domestic sheep. The SEIS states that reducing contact is a critical component in the viability of the species. Because of the potential risk of contact, the preponderance of evidence discussed in the SEIS concluding that contact between bighorn sheep and domestic sheep causes disease spread and mortality, the inherent uncertainty in modeling, and lack of information on monitoring, we have rated the Preferred Alternative, Alternative 7G, EC-2 (environmental concerns - insufficient information).

The SEIS does an admirable job of discussing and incorporating relevant publications. The Forest Service conducted the analysis, *“Risk of Analysis for Disease Transmission Between Bighorn Sheep and Domestic Sheep on the Payette National Forest”* (USDS Forest Service 2006) to better understand interactions and disease within the forest. We also commend the Forest Service for seeking direction from groups such as the Payette Science Panel, which is comprised of scientists from livestock and wildlife disease communities and the Wild Sheep Working Group who are part of the Western Association of Fish and Wildlife. These two groups made the following conclusions, “it is prudent to undertake management to prevent contact between these two species [bighorn sheep and domestic sheep]” and “effective separation between wild sheep and domestic sheep and goats should be a primary management goal...” We also appreciate that the SEIS includes a discussion of agency, Tribal, and public involvement through the Interdisciplinary Team (IDT), which included the Forest Service, cooperating state and Tribal governments, and solicitation of public comments in development of the EIS. We support the continued involvement of these groups in future planning and recommend that the EIS discuss whether or not the Payette Science Panel and IDT will continue to provide input for future management decisions.

The SEIS points out that not all data are available to make direct links between the risk of contact and viability and that there is a lack of population modeling available at this time (Pgs. 3-28 and 3-29). Although it appears that the SEIS utilizes the best science and approaches to determine risk that are available at this time, there are inherent uncertainties with the modeling and gaps in the data. Therefore, we have concerns regarding the ability of the models to accurately predict risk and recommend that as data become available, modeling be refined and that GPRs be adjusted as needed. The EIS should discuss how future data will be validated and incorporated into future planning.

Monitoring is a key component in determining whether or not management strategies are effective and also in determining the accuracy of modeling. Although the SEIS identifies monitoring as essential to understanding the management implications, the SEIS does not provide details of a monitoring plan for the reviewer to evaluate whether or not it is appropriately designed. We recommend that the final EIS include information on a proposed monitoring plan, including how monitoring will be funded, who will conduct monitoring, how often, and how results will be used to adapt management strategies.

Thank you for the opportunity to review this draft SEIS. If you would like to discuss these issues, please contact Lynne McWhorter at (206) 553-6382.

Sincerely,

/s/

Christine Reichgott, Manager  
NEPA Review Unit